

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

GREGORY AHRENS, *et al.*,

Plaintiffs,

v.

UCB HOLDINGS, INC., *et al.*,

Defendants.

Case No. 1:15-cv-00348-TWT

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT, PLAN OF  
ALLOCATION, AND APPROVAL OF NOTICE TO THE CLASS**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs hereby move this Court for an order granting preliminary approval of the class action settlement negotiated by the parties and the plan of allocation proposed by Plaintiffs' counsel, approval of notice to be sent to the class, and related relief as set forth in the proposed Order attached to Plaintiffs' Unopposed Motion for Certification of Settlement Class. This Motion is supported by the Settlement Agreement, Plan of Allocation, Memorandum of Points and Authorities, and Declarations of Joseph A. Creitz and R. Joseph Barton filed herewith.

Plaintiffs further request that the Court order a hearing on the expected Motion for Final approval. This Motion is unopposed.

Dated: January 17, 2017

Respectfully submitted,

/s/ Stephen Anderson

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**LOCAL RULE 7.1(D) CERTIFICATION**

The undersigned counsel certifies that the foregoing document has been prepared with one of the font and point selections approved by the Court in LR 5.1(B).

/s/ Joseph A. Creitz  
Joseph A. Creitz

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day caused to be filed electronically via CM/ECF a true copy of the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, PLAN OF ALLOCATION, AND APPROVAL OF NOTICE TO THE CLASS** in the United States District Court for the Northern District of Georgia, with notice of same being electronically served by the CM/ECF system, addressed to the following:

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This 17th day of January, 2017.

/s/ R. Joseph Barton  
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